



Fifth Program Year CAPER

GENERAL

GRANTEE: State of Wisconsin

CON PLAN PERIOD: April 1, 2014 to March 31, 2015

Executive Summary

See Attached Executive Summary.

Summary of Resources and Distribution of Funds

Provide a description of the geographic distribution and location of investment (including areas of low-income and minority concentration). *You are encouraged to include maps in this description.*

See the seven maps attached depicting the geographic distribution of awards and service areas for the Division of Housing (DOH) programs.

General CAPER Narratives:

1) Assessment of One-Year Goals and Objectives

Responsible for the administration of all four HUD formula grants as well as state housing funds transitioned to Department of Administration, Division of Housing (DOA-DOH) with the passage of 2011 Wisconsin Act 7, (State biennial budget act).

This report summarizes the activities and outcomes of HUD funds administered by the DOA-DOH during the period of April 1, 2014 – March 31, 2015.

The 2014-2015 program year showed progress toward meeting our anticipated goals and objectives across HUD formula grant programs.

The number of businesses assisted with CDBG funds remains lower than anticipated due to several factors. Under the current lending environment of low interest rates, businesses are finding conventional loans more advantageous than the underwriting, compliance, and long term reporting commitments required for CDBG funding. In addition, transitioning, reviewing, remediating, and closing issues discovered in projects from the former Department of Commerce remain a top priority of the Division of Housing (DOH). In an effort to ensure continued compliance, the DOH has released additional mandated training modules.

2) Affirmatively Furthering Fair Housing

- a. Provide a summary of impediments to fair housing choice.
- b. Identify actions taken to overcome effects of impediments identified in the jurisdiction's Analysis of Impediments.

IMPEDIMENT #1: LACK OF STATE LAWS EQUIVALENCE TO FEDERAL LAW.

Because the State's Open Housing Law did not include the provision of legal representation for the complainant or respondent in discrimination cases that proceed to administrative hearings or court, HUD has not certified Wisconsin as a "substantially equivalent" jurisdiction. This could result in less reporting of fair housing violations to the State as well as a potential loss of federal funds for administration, enforcement, education and outreach available to substantially equivalent jurisdictions.

ACTION TO ADDRESS IMPEDIMENT #1: LACK OF STATE LAWS EQUIVALENCE TO FEDERAL LAW.

Wisconsin Open Housing Law revisions made as part of the 2005-2007 Biennial Budget makes Wisconsin law equivalent to federal law. The revised Open Housing Law requires representation for the complainant by the Attorney General in cases where both the Department of Workforce Development and the Attorney General find probable cause. Representation by the Attorney General is provided for administrative and civil hearings, where the complainant elects to do so. In addition, at the request of the Department of Workforce Development the Attorney General will file a petition for a temporary injunction. Following the law changes, Wisconsin applied to HUD for substantial equivalency but it was not approved.

CDBG grantees are required to adopt a Fair Housing ordinance and to affirmatively further their Fair Housing ordinance by doing a minimum of three Fair Housing activities during the contractual period. Activities completed range from mailing informational letters to local realtors and lenders, doing local radio talks that cover Fair Housing principles, and writing articles to local newspapers that educate citizens about Fair Housing requirements, etc.

In addition, CDBG-Housing staff educated all of its potential and current grantees on Fair Housing laws and requirements during 2014 Application Training and 2014 Implementation Training.

IMPEDIMENT #2: LOCAL LAND-USE REGULATIONS.

Wisconsin's tradition of "home rule", embodied in the State Constitution, means that municipalities control most zoning and land use decisions (the siting of community residential facilities and environmental regulations are exceptions). The concern is that "home rule" allows communities to use ordinances to keep affordable and multifamily housing—frequently the routes by which lower-income, often minority, households enter a community—from being developed. In addition, the use of impact fees for new development raises the cost of new housing and increases the value of existing housing, thus generally reducing affordability. In short, zoning and impact fees can have the effect of "disparate impact". Policies that appear neutral on their face may actually increase segregation.

ACTION TO ADDRESS IMPEDIMENT #2: LOCAL LAND-USE REGULATIONS.

The success of State HOME recipients in promoting their program locally and providing affordable housing opportunities to all racial and ethnic groups is evidenced by the March 31, 2015, HOME Program Progress Dashboard. Per 03/31/15 dashboard, non-white households account for 8.6% of the HOME rental projects, 11.4% of the homebuyer projects, and 5.2 of the homeowner rehab projects. These percentages compare favorably with the 2003 Census estimate of a 4.1% ethnic and minority population for the Wisconsin Balance of State (the category that closely aligns with the State's jurisdiction).

The HOME Rental Housing Development (RHD) continues to fund projects with three, four, or occasionally, more bedrooms throughout the Balance of State area. HOME RHD partners with WHEDA Low-Income Housing Tax Credits (LIHTC) on many of these projects.

The scoring system for the WHEDA Low-Income Housing Tax Credit program applications includes preference points for developing large family units (3-bedroom or larger), units intended for occupancy by residents with special needs, and units with accessible design.

IMPEDIMENT #3: LOCAL DISCRIMINATION IN CONSUMER LENDING.

The administrative code (DFI-Bkg 80.85) on discrimination in the granting of credit prohibits discrimination on the basis of sex or marital status only. Currently, a complainant would have to seek remedy from the Department of Workforce Development, Division of Equal Rights under the Open Housing Law.

ACTION TO ADDRESS IMPEDIMENT #3: LOCAL DISCRIMINATION IN CONSUMER LENDING.

The Department of Financial Institutions (DFI) has amended ss. DFI-Bkg 80.85 (1) and (2), and created s. DFI-BKG 80.85 (5), Wis. Admin Code (DFI-WCA1 Wisconsin Consumer Act), effective 9/17/05, to expand the bases of discrimination for consumer lending by banks. The rule makes discrimination on a prohibited basis in the granting or extension of credit an unconscionable credit practice. The rule now defines prohibited basis to include sex, marital status, age provided the applicant has the capacity to enter into a binding contract, race, creed, religion, color, disability, national origin, ancestry, sexual orientation, or membership in the military forces of the United States or this state; that all or part of the applicant's income derives from any public assistance program; and that the applicant has in good faith exercised any right under the Consumer Credit Protection Act or any state law.

IMPEDIMENT #4: PREDATORY LENDING.

While the effects of past predatory lending can still be seen across the state and loans with abusive terms have created hardships among thousands of vulnerable households, recently enacted Wisconsin and federal laws have all but eliminated any new predatory loan activities from occurring. Stronger regulatory standards and heightened consumer awareness have improved lending practices in the state.

ACTION TO ADDRESS IMPEDIMENT #4: PREDATORY LENDING.

Although recent law changes have improved the lending environment, DFI continues to closely monitor mortgage bankers, brokers, and originators. In addition, we have made available some foreclosure prevention funds to assist borrowers that may still be affected by lending practices of the past.

In addition, division staff continues to support homebuyer education which includes predatory lending training. Lending options, which includes a predatory lending discussion, is part of mandatory homeowner education that all households receiving homebuyer assistance are required to attend.

Finally, one of the required activities in the Division's annual fair contract, currently with the Metropolitan Milwaukee Fair Housing Council (MMFHC), is to provide information and training on Fair Lending Laws and practices.

IMPEDIMENT #5: PREDATORY APPRAISALS.

Predatory appraisals, whether due to collusion between appraisers and lenders or due to pressure put on appraisers by a third party, decrease the affordability of housing by increasing fees that are based on the value of the home, and can result in decreased equity from homeownership. Legal protection against predatory appraisals is limited. Appraisers are required by statute and professional ethics guidelines to appraise properties honestly, rather than on a predetermined basis.

ACTION TO ADDRESS IMPEDIMENT #5: PREDATORY APPRAISALS.

The changes in state and federal laws that regulate lending practices have made predatory appraisals less common statewide.

In Wisconsin, a real estate appraiser is a person engaged in the practice of real estate appraisal. Real estate appraisal means providing an analysis, opinion or conclusion relating to the nature, quality, value or utility of specified interests in or aspects of real estate. Wisconsin grants three types of credentials, licensed appraiser, certified residential appraiser, and certified general appraiser.

Federal mandate requires that after January 1, 1993, all appraisers must be licensed or certified by a state licensing agency in order to conduct appraisals which involve "federally related transactions." However, appraisers are not required to be licensed or certified in Wisconsin in order to perform "non-federally related transactions."

Licensing involves taking and passing a real estate appraisal exam. A handbook has been prepared by the Department of Safety and Professional Services to help applicants prepare for the exam. Among the subjects covered are social, governmental, legal and regulatory aspects of real estate markets.

IMPEDIMENT #6: HOUSING STOCK.

The housing stock in Wisconsin provides limited housing choices for people with mobility impairments and for large families. Much of Wisconsin's housing stock is older and is not accessible for people with mobility impairments to do an initial inspection, thus limiting housing choice.

Housing choices for larger families are limited due to occupancy standards and the low availability of homes with many bedrooms. According to the 2000 Census, in owner-occupied housing, more than 77 percent of the units had three or more bedrooms. However in rental housing, more than 76 percent of the rental housing stock had two or fewer bedrooms.

ACTION TO ADDRESS IMPEDIMENT #6: HOUSING STOCK.

Homebuyer new construction houses that were completed and occupied during this time period were constructed to provide for first floor visitability.

State-administered housing programs address the need for rental units for larger families through the HOME housing programs, including RHD, which continue to fund projects with three, four, or occasionally, more bedrooms. Plus, the WHEDA LIHTC program provides preference points for developing large family units (3-bedroom or larger), units intended for occupancy by residents with special needs, and units with accessible design.

HOME RHD funds projects with 0 (efficiency) bedrooms up to four, or occasionally more bedrooms, and partners with WHEDA Low-Income Housing Tax Credits (LIHTC) on many of these projects.

For this reporting period, CDBG, HOME, NSP1 and 3 and state-funded programs continued to provide housing assistance for special needs households.

IMPEDIMENT #7: LANGUAGE BARRIERS.

Wisconsin is home to many people who speak English as a second language (ESL) that have varying levels of competency in the English language. It is likely that this population will continue to increase due to immigration. The ESL population is a double concern due to their English language skills and because the ESL population tends to be lower-income, and thus have limited resources. Households with limited English language capacity are less likely to be aware of their rights and of resources available to aid in cases of housing discrimination. In addition, these households may not be aware of other housing resources available, putting these households at a disadvantage in securing housing. Even households where English is spoken well may find it easier to understand documents available in their first language.

ACTION TO ADDRESS IMPEDIMENT #7: LANGUAGE BARRIERS.

Some of DOH's grantees have access to interpreters to help conduct outreach and translate information for non-English speaking persons. They also produce non-English language program brochures.

OTHER ACTIVITIES:

- Division of Housing staff attend and participate in the Wisconsin Fair Housing Network's regular meetings and annual statewide event. DOA-DOH staff members coordinated the statewide Fair Housing Poster, Video, and Essay Contest. A number of DOA-DOH staff members served as contest judges.

- *DOH staff provided training, technical assistance and program materials to its recipients on fair housing and equal opportunity issues, affirmative marketing and the use of local women-owned and minority-owned businesses as suppliers of goods and services.*
- *CDBG grantees are required to perform 3 activities to affirmatively further fair housing throughout their contractual period. Appropriate display of fair housing posters are checked during DOH monitoring visits.*
- *DOA-DOH provided \$56,700 for a contract with the Metropolitan Milwaukee Fair Housing Council to undertake a variety of fair housing related activities in both HOME entitlement and non-entitlement areas, including:*
 - ***Fair housing complaint intake, investigation and referrals.** (MMFHC received and processed complaints regarding discrimination based on race/color, national origin, sex, religion, disability, familial status, age, marital status, lawful source of income, sexual orientation and ancestry.)*
 - ***Conducting fair housing testing.** (MMFHC conducted fair housing testing activities, including in HOME non-entitlement areas.)*
 - ***Offering referral services to clients with non-fair housing inquiries.** (MMFHC provided referral services to clients with questions on topics such as rent abatement, breaking a lease or repair-related concerns, including those in HOME non-entitlement areas.)*
 - ***Technical assistance in fair housing to Wisconsin residents, housing providers and social service agencies throughout Wisconsin.** (MMFHC provided technical assistance, including instances in HOME non-entitlement areas. The assistance provided included clarification of fair housing law, information on legal and/or administrative interpretation of the law, information on the nature and extent of housing discrimination and demographic data.)*
 - ***Distribution of fair housing and fair lending educational materials.** (MMFHC distributed significant fair housing and fair lending materials on numerous occasions throughout Wisconsin.)*
 - ***Conducting presentations, workshops or trainings to provide information on fair housing and fair lending laws and practices.** (MMFHC planned and conducted workshops in various locations around the state that covered fair housing law, fair lending and predatory lending.)*
- *DOA-DOH made Fair Housing-related awards in 2014-2015. **Legal Action/Wisconsin** provided mediation and counseling to homeless households and households at risk of homelessness in several counties through funds from the Emergency Solutions Grant (ESG) and the Homelessness Prevention Program (HPP). All agencies receiving homeless funds are required to provide data regarding the demographics of the populations receiving services.*

3) Address Obstacles to Meeting Underserved Needs

As the State's housing agency, DOA-DOH provides general information and guidance on housing issues and programs to the Administration and Legislature, as well as to a wide range of individuals and organizations across Wisconsin, including current grantees. The Division responds to hundreds of housing inquiries annually and distributes housing funds to address gaps in Wisconsin's affordable housing stock.

The DOA-DOH continues to provide training and technical assistance to applicants and grantees, including grant application training and grant implementation training for HOME, CDBG, ESG, and state grant programs.

DOA-DOH staff sponsor, participate in, and attend a broad range of training opportunities to stay current on requirements, share best practices, and support agencies and populations affected by our programs. Staff members continue to stay involved with state and national (COSCEA) organizations.

The division reviewed and provided Certifications of Consistency with the State’s Consolidated Plan for 68 project applications and Annual Plans being submitted to HUD in 2014-2015.

4) Foster and Maintain Affordable Housing

The Wisconsin Housing and Economic Development Authority (WHEDA) is a quasi-public agency that sells bonds on the national markets to fund loans to home buyers, rental housing owners and businesses at attractive rates and terms. WHEDA also oversees two major Federal affordable housing programs: the Low-Income Housing Tax Credit (LIHTC) program and assistance under the Section 8 program.

The tables below list their activities from 2014 with the Tax Credit Program.

Affordable Housing Tax Credits	Credits Allocated (\$)	Affordable Units Created
9% Tax Exempt Bond Projects	\$13,607,057	1,236
Tax Exempt Bond Projects	\$754,397	208

5) Leveraging Resources

FEDERAL RESOURCES AVAILABLE

Funds made available statewide, except in CDBG entitlement or HOME PJ areas

FEDERAL RESOURCES	Anticipated	Anticipated	Actual*	Actual*	Actual*
HUD Formula Grants	Grant Authorization	Pro Income/Recap Funds	Grant Authorization	Pro Income/Recap Funds	Total Available
Community Development Block Grant (CDBG)	\$23,640,800	\$26,139,000	\$24,646,683	\$18,273,706	\$42,920,389
Housing Investment Partnership Program (HOME)	\$7,596,000	\$800,000	\$8,576,532	\$1,311,864	\$9,888,396
Emergency Solutions Grant (ESG)	\$2,544,000		\$3,169,745		\$3,169,745
Housing Opportunities for Persons With AIDS (HOPWA)	\$420,000		\$466,613		\$466,613
Subtotal HUD Formula Grants	\$34,200,800	\$26,939,000	\$36,859,573	\$19,585,570	\$56,445,143

* Does not include prior year funding carryover

FEDERAL RESOURCES	Anticipated	Actual
HUD Competitive Grants		
Shelter Plus Care [Renewal grant began on 07/01/14]	\$ 252,320	\$ 254,512

FEDERAL RESOURCES	Anticipated	Actual
H&HS Grants		
H&HS Projects for Assistance in Transition from Homelessness (PATH) [07/01/14-06/30/15]	\$ 805,000	\$ 836,000
SSI/SSDI Outreach, Access & Recovery (SOAR)	\$ 74,000	\$ 74,000

STATE RESOURCES AVAILABLE

Funds are available statewide.

STATE RESOURCES State Programs (Housing Resources)	Anticipated	Actual
Housing Cost Reduction Initiative (HCRI)	\$ 1,300,000	\$ 1,300,000
Homeless Prevention Program (HPP)	\$ 1,515,000	\$ 1,515,000
Critical Assistance (CA)	\$ 282,800	\$ 282,800
State Shelter Subsidy Grant (SSSG)	\$ 1,113,600	\$ 1,113,600
Transitional Housing (THP)	\$ 300,000	\$ 300,000
State PATH Match Aids	\$ 42,200	\$ 42,200
Sub-total State (Housing Resources)	\$ 4,553,600	\$ 4,553,600

STATE RESOURCES Private Funds (Housing Resources)	Anticipated	Actual
IBRETA	\$ 30,000	\$ 18,999

STATE RESOURCES Other Sources	Anticipated	Actual
Wisconsin Fresh Start Funds (Department of Corrections)	\$ 254,895	\$ 254,895

FEDERAL RESOURCES UTILIZED

HUD Formula Grants (Local Aids)	Obligations/ Commitments**	Expenditures/ Disbursements**
Community Development Block Grant (CDBG) <small>[includes program income]</small>	\$ 27,091,389	\$ 19,096,937
Housing Investment Partnership Program (HOME) <small>[includes program income]</small>	\$ 10,541,933	\$ 8,730,220
Emergency Solutions Grant (ESG)	\$ 3,211,551	\$ 3,040,734
Housing Opportunities for Persons With AIDS (HOPWA)	\$ 452,615	\$ 342,900
Subtotal HUD Formula Grants	\$41,297,488	\$31,210,791

HUD Competitive Grants	Obligations/ Commitments**	Expenditures/ Disbursements**
Shelter Plus Care	\$254,512	\$ 228,353

** "Obligations/Commitments" and "Expenditures/Disbursements" are based on WI Financial System data.

NOTE: "Obligations/Commitments" are new obligations for the period 04/01/14 – 03/31/15 while "Expenditures/Disbursements" are all expenses paid out for the period 04/01/14 – 03/31/15. This includes payments made against CDBG obligations from 04/01/14 – 03/31/15 and CDBG obligations from prior years.

CDBG: Although this program does not require local governments to provide a match, CDBG non-housing grants require at least a 50% match, with 10% coming directly from the unit of general local government.

HOME: DOA-DOH more than meets the 25% match requirement through grantee agencies providing the match and through the significant State programs that provide matching funds (HCRI/CA, Department of Health Services, Department of Corrections, Department of Administration, WHEDA's Home Loan Program, and the WHEDA Foundation).

ESG: Each organization that receives Emergency Solutions Grant funding is required to match its grant dollar-for-dollar. The grantees use CDBG funds, private donations, in-kind staffing and volunteer time, and state programs to address match requirements.

HOPWA: Matching funds are not required for HOPWA grants.

6) Citizen Participation

*The Department of Administration published a “Notice of Availability for Public Comment” for this Consolidated Annual Performance and Evaluation Report on June 9th, 2015 in the Wisconsin State Journal, the State’s newspaper of record. The department accepted comments through June 24th, 2015 as outlined in the State’s Citizen Participation Plan. **No comments were received.***

7) Institutional Structure

The State has exceeded the required minimum of 15 percent of its HOME funding for community housing development organizations (CHDOs). Over 28% of FY10, 21% of FY11, and 28% of FY12 HOME funds have been reserved for CHDOs. Currently, CHDO awards total over 19% of FY13 HOME funding. This shows our commitment to the long-term development of stable nonprofit housing developers throughout the State.

DOA-DOH emphasizes training of applicants and grantees to strengthen the ability of local governments and private organizations to administer HUD funding in addition to issuing updates to program handbooks; CDBG Housing (with workshops on financial management and general administration), HOME and ESG (meetings and Continuum of Care sessions).

To enhance interagency coordination, various staff members of the Division of Housing worked with the following State agencies and councils in the past year:

- *Department of Health Services
 - *Participated in homeless service coordination*
 - *Participated on the Wisconsin Council on Mental Health*
 - *Reviewed plans for mental health funds block grant*
 - *Partnered on efforts to eliminate child lead poisoning**
- *Department of Corrections
 - *Funded Wisconsin Fresh Start Program**
- *Department of Public Instruction
 - *Partnered in the Continuum of Care and other homeless activities**
- *USDA Rural Development
 - *Participated in information sharing*
 - *Collaborated on physical inspection monitoring**
- *Department of Veterans Affairs
 - *Partnered in the Continuum of Care and other homeless activities**
- *Wisconsin Housing and Economic Development Authority (WHEDA)
 - *Coordinated Tax Credits and HOME rental housing locater service*
 - *Collaborated on Section 811 application**
- *State Historical Society
 - *Worked jointly to meet section 106 review responsibilities**
- *Department of Military Affairs
 - *Coordinated with Division of Emergency Management and FEMA in response to natural disaster relief and mitigation efforts**
- *Department of Children and Families
 - *Collaborated with Emergency assistance staff*
 - *Collaborated with foster care staff**
- *Department of Administration*

- Coordinated efforts with Division of Energy on energy efficiency funding and projects
- Served America Board and application reviews and Wisconsin Fresh Start
- Department of Natural Resources
 - Coordinated efforts
 - Participated in information sharing
- University of Wisconsin Extension
 - Developed tenant education materials
 - Participated in homebuyer education counseling
 - Prepared homeless research
 - Prepared housing needs trends analysis

DOA-Division of Housing staff members participated in the following coalitions of public and private-sector housing industry organizations:

- Balance of State, Racine, Madison, and Milwaukee Homeless Continuum of Care
- Wisconsin Community Action Programs Association
- Wisconsin Collaborative for Affordable Housing
- Wisconsin Fair Housing Network
- Wisconsin Council on Mental Health
- Wisconsin Child/and Lead Poisoning Elimination Committee
- Wisconsin Council on Physical Disabilities
- Wisconsin Association of Housing Authorities
- Statewide Independent Living Council
- State Interagency Homeless Services Workgroup
- WHEDA/USDA/HUD/DOA initiatives

8) Monitoring

- a. Describe actions taken to monitor the jurisdiction's performance in meeting objectives and outcomes set forth in its strategic plan.

The Department of Administration continues to address items flagged for clean-up from the Office of Inspector General report of projects from the former Administration's Department of Commerce. The files are prioritized for monitoring visits and any additional data clean-up. The Department of Administration has performed both application and project implementation training for grantees to ensure that all federal rules and regulations are followed.

- b. Describe how and the frequency with which you monitored your activities, including sub-recipients (including sponsors or administering agents).

See item "c".

- c. Describe the results of your monitoring including any improvements made as a result.

The Department of Administration has followed the monitoring policies and guidelines in the Annual Plan. Concerns and deficiencies have been addressed with grantees and appropriate actions have been taken. There is more consistency in the fiscal operations of grantee agencies due to the recommendations made following monitoring visits. We continue to update program manuals as needed.

- d. Describe actions taken to insure compliance with program requirements, including requirements involving the timeliness of expenditures.

DOA-DOH managers receive monthly reports from the Department's Division of Administrative Services staff, and DOA-DOH meets with them as necessary to review fund balances, commitments, expenditures, and insure compliance with grant regulations.

- e. Describe steps/actions taken to ensure long-term compliance with housing codes, including any actions or on-site inspections undertaken during the program year.

Local governments enforce housing codes. Generally, the State does not have long term control over the properties using sub-recipient funds. However, DOA-DOH is responsible for reviewing HOME Housing Development projects for compliance with HQS, long-term affordability, and occupancy requirements.

- f. What is the status of your grant programs?

- i. Are any activities or strategies falling behind schedule?

Wisconsin winters continue to play a factor in the initial start date of projects. However, all have movement once the weather improves.

- ii. Are grant disbursements timely?

Yes

- iii. Do actual expenditures differ from letter of credit disbursements?

In general activities are on schedule and disbursements timely.

9) Antipoverty Strategy

Describe actions taken during the last year to reduce the number of persons living below the poverty level.

A number of housing program grantees encourages their recipient households, as a condition of assistance, to become as self-sufficient as possible. State staff encourages the development of self-sufficiency components within an applicant's program design. Through these efforts, the Division seeks not only to stabilize households in crisis but also to reduce households' dependence on public assistance and to begin developing pathways out of poverty. Individuals are encouraged to increase self-sufficiency through vocational education and support as well as assistance in the application process for benefits by persons with disabilities.

The "Projects for Assistance in Transition from Homelessness" (PATH) program works with other homeless and housing activities in the state, in targeting chronically homeless persons with mental illness, resulting in greater self-sufficiency for participants.

The Wisconsin Fresh Start program works with at-risk youth to help them transform their lives through education and job skills training. Program participants earn their basic skills or high school equivalent diplomas while constructing affordable housing for low to moderate income households.

The Emergency Solutions Grant program has fostered self-sufficiency by ensuring participants access to available mainstream and homeless resources for which they are eligible. Agencies receiving program funds must actively refer their clients where appropriate for case management, emergency financial assistance, domestic violence shelters, homeless outreach services, legal services and medication, local housing authorities, subsidized housing, specialized supportive housing programs, job training and employment services, temporary labor agencies, childcare resources, consumer credit counseling, mental health and substance abuse assessment and treatment, nutritional supplements and youth development and child welfare.

The Emergency Solutions Grant also supported initiatives that provide short- to medium-term rent assistance and housing stability case management to individuals and families resulting in safe and permanent housing.

Continued collaborative efforts with State and local partners inform local communities of programs available to them to maximize the impact of program dollars and the quality of housing and homeless initiatives.

10) Self-Evaluation

Providing Decent Housing Objective

Outcome	Activity	Indicator	Estimated 2014 Total	Actual 2014 Total
Availability/ Accessibility	<u>New Housing Units</u> <ul style="list-style-type: none"> Rental Housing Development Owner Housing Development 	Housing Units Assisted	137 Rental 0 Owner	81 Rental 9 Owner
	<u>Public Infrastructure</u> <ul style="list-style-type: none"> Water & sewer, street extensions, etc., for housing development 	Persons Assisted	0	0
Affordability	<u>Housing Rehabilitation</u> <ul style="list-style-type: none"> Rental Rehab Owner Rehab 	Housing Units Assisted	42 Rental 525 Owner	18 Rental 479 Owner
	<u>Homebuyer Assistance</u> <ul style="list-style-type: none"> First time Homebuyers Down payment, closing costs New Construction Financing Acquisition & Rehabilitation 	Households Assisted	236	93
Sustainability	<u>Public Site Improvements for Affordable Housing</u> <ul style="list-style-type: none"> Neighborhood Improvements (Drainage, etc.) 	Persons Assisted	31	0

Creating Suitable Living Environment Objective

Outcome	Activity	Indicator	Estimated 2014 Total	Actual 2014 Total
Availability/ Accessibility	<u>Public Facilities</u> <ul style="list-style-type: none"> Senior Centers New treatment plants Fire trucks 	Persons Assisted	3,000	5,206
	<u>Housing Assistance to Homeless Persons</u> <ul style="list-style-type: none"> Shelters Rent & Security Deposits Supportive Services 	Households Assisted	19,070	46,437*
	<u>Accessibility Improvements to Housing Units</u> <ul style="list-style-type: none"> Handicapped access improvements 	Housing Units Assisted	94	>90
Sustainability	<u>Slum & Blight Remediation</u> <ul style="list-style-type: none"> Site clearance Site clean up 	Communities Assisted	1	1
	<u>Public Infrastructure</u> <ul style="list-style-type: none"> Water & Sewer Curb & gutter, sidewalks, streets Electrical 	Persons Assisted	30,000	37,665
	<u>Public Facilities</u> <ul style="list-style-type: none"> Libraries Fire stations Treatment plant upgrades 	Persons Assisted	6,000	21,414

	<u>Special Needs Housing Assistance</u> <ul style="list-style-type: none"> Rent Utilities Mortgage Payments 	Persons Assisted	324	606
	<u>Local/Regional Planning Efforts</u> <ul style="list-style-type: none"> Plans 	Communities Assisted	12	1

* For Program Years 1-4, data for "Households Assisted" was captured. For Program Year 5 (due to a HUD mandated change), the **Actual 2014 Total** shows "persons served" by ESG, HPP, THP, SSSG, Critical Assistance, CDBG SOAR, (Regular) SOAR, PATH, and HOME-TBRA programs.

Creating Economic Opportunity Objective

Outcome	Activity	Indicator	Estimated 2014 Total	Actual 2014 Total
Availability/ Accessibility	<u>Public Facilities or Infrastructure for Businesses</u> <ul style="list-style-type: none"> Water & sewer, streets, etc. Treatment plants Industrial Parks 	Jobs Created/ Retained	100	1055**
	<u>Quality Job Creation or Retention</u> <ul style="list-style-type: none"> Business Loans & Grants 	Jobs Created/ Retained	500	0
Affordability	<u>Dairy Farm Job Creation</u> <ul style="list-style-type: none"> Business Loans 	Jobs Created/ Retained	0	0
	<u>Slum & Blight Remediation for Business Creation or Expansion</u> <ul style="list-style-type: none"> Site clearance Site clean up 	Jobs Created	0	0

** Includes projects from previous years that closed out from 04/01/14 – 03/31/15.

See assessment narrative on Page 1. Meeting our overall major goals was achieved.

HOUSING

Affordable Housing

11) Evaluate progress in meeting its specific affordable housing objectives, including:

- a. Comparison of proposed numeric goals (from the strategic plan and annual plan) with the actual number of extremely low-income, low-income, and moderate-income renter and owner households assisted during the reporting period.

See table above & CPMP tool tables. The type of project, which determines beneficiaries within each performance measure category, can only be estimated in the Annual Plan since local grantees, not the Department, carry out direct household, community or business activities.

- b. Report the number of households served meeting the Section 215 requirements of affordable housing (essentially meeting the definitions in 24 CFR 92.252 and 92.254 for renters and owners, respectively).

See table above & CPMP tool tables.

- c. Describe efforts to address worst case needs (defined as low-income renters with severe cost burden, in substandard housing, or involuntarily displaced).

Across the board, DOA-DOH programs are purposely designed to prioritize and direct funds to our neediest citizens. See narrative regarding homelessness prevention in next section.

- d. Description of efforts to address the accessibility needs of persons with disabilities.

Over 90 projects funded with affordable housing funds addressed accessibility needs.

Public Housing Strategy

12) Describe actions taken during the last year to improve public housing and resident initiatives.

DOA-Division of Housing funds (NSP1 and 3, CDBG and HCRI/HOME homebuyer/rehabilitation program) were made available by local grantees to provide down payment, rehabilitation, and closing cost assistance to public housing or other assisted housing residents seeking to become homeowners or improving their homes.

HOME TBRA and Homeless Prevention programs, continued to fund short to medium term rental assistance, security deposits, and first/last month rent to support individuals and families that may soon be housing authority tenants or housing choice voucher participants.

Staff regularly attends WI Association of Housing Authority meetings and conferences to announce funding opportunities and provide information applicable to public and assisted housing and serve as resource advisors to the state WI Association of Housing Authority board of directors.

Barriers to Affordable Housing

13) Describe actions taken during the last year to eliminate barriers to affordable housing.

Staff, in compliance with the State's Affordable Housing Impact Act (1995), have reviewed and reported on bills and proposed administrative rules that affect housing.

Wisconsin Statutes provide for local units of government enforcing zoning codes, land division ordinances, or official maps to adopt a Comprehensive Plan.

The DOA Division of Intergovernmental Relations (DIR) assists local governments in Wisconsin with their planning efforts. As part of a previous grant program and statutory requirements, local governments were asked to provide a description by which 14 local, comprehensive planning goals would be achieved. One of the goals was to provide "an adequate supply of affordable housing for individuals of all income levels throughout each community." Since the enactment of the Comprehensive Planning Grant law, over 1,400 communities have developed and implemented plans that contain a housing element detailing affordable housing inventory and needs.

Another barrier to affordable housing mentioned is lead-based paint. DOA-DOH and DHFS have ongoing efforts to evaluate and address lead-based paint hazards. Housing staff participate on a Department of Health Services lead task force to end childhood lead poisoning.

Lead-based Paint

14) Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Wisconsin continued to seek resources at the state and local level to address identified lead hazards in priority housing. The Department of Health Services reviews risk assessments and certified subcontractors to carry out or oversee the lead hazard reduction activities.

The Division of Housing continues to work with the Department of Health Services lead-based paint staff. Lead-safe work practices were utilized on 251 rehabilitation projects with CDBG and HOME grant funds this year.

HOMELESS

Homeless Needs

- 15) Identify actions taken to address needs of homeless persons.**
- 16) Identify actions to help homeless persons make the transition to permanent housing and independent living.**
- 17) Identify actions taken to implement a continuum of care strategy for the homeless and new Federal resources obtained during the program year, including from the Homeless Super NOFA.**

**If not using the CPMP Tool: Use Table 3B, 1C*

**If using the CPMP Tool: Use Needs/Homeless, Needs/Non-Homeless, Annual Housing Completion Goals, and Summary of Specific Annual Objectives*

Specific Homeless Prevention Elements

- 18) Identify actions taken to prevent homelessness.**

Emergency Solutions Grants (ESG)

- 19) Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).**

20) Assessment of Relationship of ESG Funds to Goals and Objectives

- a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.

**If not using the CPMP Tool: Use Table 2A, 3B, 2B, 1C, 2C, 3A)*

**If using the CPMP Tool: Use Need/Housings, Needs/Community Development, Annual Housing Completion Goals, and Summary of Specific Annual Objectives.*

- b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.

21) Matching Resources

- a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.

22) State Method of Distribution

- a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as sub recipients.

23) Activity and Beneficiary Data

- a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESG expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
- b. Homeless Discharge Coordination
 - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
 - ii. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

PY 5 CAPER HOMELESS Response:

The State views homelessness as a top housing priority. The Bureau of Supportive Housing (BSH) continued to support four primary continuums of care groupings, overseeing homeless programs for individuals and families. It also sought additional funding to fill gaps in services, broadened existing emergency shelter and homelessness prevention activities, emphasized rapid re-housing, helped people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness and supported more coordinated and effective data collections, performance measurement, and program evaluation. BSH also continued to work with a variety of entities to address the root causes of homelessness.

Specifically, the State's homelessness strategy consists of:

- *The HMIS was successfully transitioned to a private non-profit. This will allow the program to reach a wider variety of homeless and supportive service providers throughout the state by providing data collection and outcomes data information.*
- *Continuation of GPR funding for emergency shelters, prevention, rapid re-housing and transitional housing. More than \$3.5 million in State Shelter Subsidy, Transitional Housing, Homeless Prevention Program, Critical Assistance, and Interest Bearing Real Estate Trust Account Grant funds were committed to over 60 homeless housing and service providers.*
- *DOH organizes an interagency workgroup comprised of governmental agency representatives. Its mission is to prevent and shorten homelessness through improved access to services and housing by sharing information and data on accessing needed services and affordable housing, proposing actionable goals to reduce homelessness, identifying and addressing barriers to accessing services and service delivery effectiveness and identifying match, leverage, and funding opportunities across agencies to maximize available resources.*

- *Priority use of HUD ESG funds for prevention and rapid-housing services. Approximately 46% of HUD ESG funds were committed to Prevention and Rapid Rehousing. In addition, \$1,797,800 in state funds were provided for Homelessness Prevention and Rental Assistance through the Homelessness Prevention and Critical Assistance Programs.*
- *Provision of technical assistance to homeless shelter and service programs to assist them in accessing funding, program and data management, implementation and integration of HEARTH regulations, development of coordinated assessment and centralized intake, and homelessness documentation.*
- *DOA requires all agencies receiving ETF funding to ensure an accurate count of homeless persons. Point in Time surveys were completed and provided to DOA. Agencies worked with law enforcement and community groups to do street counts.*
- *BSH staff acts as the state contact for the SSI/SSDI Outreach, Access and Recovery (SOAR) program, which expedites SSI/SSDI applications for people who are homeless and have a severe mental illness. Mental Health Block Grant funding, received through an MOU with Wisconsin Department of Health Services (DHS) enables three SOAR sites to be funded. These are in Milwaukee, Waukesha, and La Crosse. Two additional sites in Racine and Outagamie are funded with CDBG funds.*
- *BSH staff acts as the state contact for the Substance Abuse and Mental Health Services Administration's (SAMHSA) Projects for Assistance in the Transition from Homelessness (PATH), which provides services to people who are homeless and have severe mental illness, with special emphasis on persons in need of services which are not supported by mainstream mental health programs. People with repeated or long episodes of homelessness need effective outreach and a considerable level of long-term support. PATH projects funded by the BSH are located in 8 of the highest populated counties in the state.*
- *Tenant Based Rental Assistance (TBRA) is a rental subsidy that Grantees can use to help individual households afford housing costs such as rent and security deposits. Households targeted for the HOME TBRA funds must have incomes of less than sixty percent of county median income (CMI) and include homeless individuals with a disability and homeless families or households at risk of homelessness. DOH encourages using a "Housing First" model of housing and support services. BSH funded **eight** TBRA programs across the state.*

Emergency Solutions Grants

For the "2014-2015" program year, HUD allocated \$3,169,745 in Emergency Solutions Grant funding to the State of Wisconsin. Three entitlement jurisdictions in Wisconsin also received direct HUD grants (the Madison, Milwaukee, and Racine awards are not included here). The State distributes its ESG funds through an RFP process to non-profit organizations, housing authorities and units of local government.

DOA-Division of Housing obligated \$3,204,568 of ESG funds to 25 non-profit providers and units of local government, representing 117 agencies, for the purpose of serving homeless people and households at risk of losing their housing. In addition, DOA-Division of Housing allocated \$300,000 in Transitional Housing Program Grant funds and \$1,506,718 in Homelessness Prevention Program Grant funds with these ESG contracts. The local providers used the funds for homelessness prevention, rapid re-housing, rehabilitation, essential services and operating costs.

IDIS reports (for ESG) are attached to this Narrative.

State Shelter Subsidy Grants

The State Shelter Subsidy Grant covers up to 50% of the operating costs of local homeless shelter programs. DOA-Division of Housing distributes funds throughout the State by formula, based on past shelter use and anticipated need, to three "regions": Milwaukee County, Dane County and the remainder of the State.

During the 2014 program year, DOA-Division of Housing obligated \$1,133,600 in new SSSG funds.

Transitional Housing Grants

The Transitional Housing Grant Program provides funds to develop or expand transitional housing programs and services to assist homeless individuals and families. The goal is to fund a variety of mechanisms that will assist a homeless individual or families achieve real, lasting economic independence. Funds may be used for leasing, operating and supportive service costs.

The program is open to government or private non-profit agencies that currently operate transitional housing programs, if they will increase the number of persons served by their program or will provide additional supportive services to existing program participants. Funds are also available to government and private non-profit agencies that want to initiate service programs in their area.

Homelessness Prevention Program (HPP) Grants

The Homelessness Prevention Program (HPP) provides funds to support a variety of eviction prevention and re-housing programs that assist individuals and families who are homeless or imminently at-risk of becoming homeless either get into or stay in safe, affordable, permanent housing. These dollars support direct financial assistance to defray housing costs.

DOA-Division of Housing awarded \$1,506,718 from the state allocation. The HPP funds provide match for the ESG projects.

Continuum of Care

The Division of Housing collaborated with four umbrella Continuum of Care (CoC) entities to support efforts to apply under the HUD CoC competition.

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs

**Refer to the Non-homeless Special Needs Table in the Needs.xls workbook or Table 1C.*

24) Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

See narrative in Homeless section (above) and HOPWA Consolidated Annual Performance and Evaluation Report (CAPER) Measuring Performance Outcomes report (attached).

COMMUNITY DEVELOPMENT

Community Development Block Grant

25) Assessment of Relationship of CDBG Funds to Goals and Objectives

- a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.

***If not using the CPMP Tool:** Use Table 2A, 3B, 2B, 1C, 2C, 3A)

***If using the CPMP Tool:** Use Need/Housings, Needs/Community Development, Annual Housing Completion Goals, and Summary of Specific Annual Objectives.

See CPMP tables & table under 10). CDBG Non-housing funds have been awarded to projects identified as high and medium priorities in our Annual Action Plan.

- b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.

***If not using the CPMP Tool:** Use Table 2A, 3B, 2B, 1C, 2C, 3A)

***If using the CPMP Tool:** Use Need/Housings, Needs/Community Development, Annual Housing Completion Goals, and Summary of Specific Annual Objectives.

See CPMP tables & table under 10).

- c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

For CDBG-Housing awards, over 95% of the beneficiaries are extremely low-income, low-income, and moderate-income households. Sub-recipients continue to note that a significant number of applications are received from households with unemployed household members.

For CDBG non-housing, over 70% of the funds awards met the LMI National Objective criteria.

26) Changes in Program Objectives

- a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.

During 2014, the DOA-DOH Emergency Assistance Program (EAP) staff continued to manage the final stages of the \$140 million in CDBG Disaster Recovery Supplemental funding to address housing, public infrastructure, and business assistance awards to local governments in the 31 counties that were declared as Presidential disaster areas in 2008. In addition, during 2014 the DOA-DOH worked with other local, state, and federal agencies to address new weather related disasters. CDBG-Housing funds were made available to the following units of general local government to assist with disaster related repairs and reconstruction:

- *Iowa County (\$55,000 – June tornadoes & severe wind storms)*

27) Assessment of Efforts in Carrying Out Planned Actions

- a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.
- b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.
- c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.

a) and b) answered previously.

c) The Department of Administration did not hinder implementation of the 2013 Action Plan. Notices of the availability of the Plan and Consolidated Annual Performance and Evaluation Report were timely and in accordance with the State's Citizen Participation Plan.

HUD's formula funding was made available in a timely fashion to the State's entire service area and in accordance with the methods of distribution that the Department of Administration laid out in the Annual Plan.

28) For Funds Not Used for National Objectives

- a. Indicate how use of CDBG funds did not meet national objectives.
- b. Indicate how use of CDBG funds did not comply with overall benefit certification.

The Department of Administration (DOA) Division of Housing is the successor agency for projects granted federal formula funds by the former Administration's Department of Commerce. A 2012 monitoring of the CDBG State program resulted in findings related to economic development activities funded prior to 2011 by the former Department of Commerce. HUD determined four CDBG projects did not meet a national objective. Therefore, the use of these CDBG funds by the former Department of Commerce did not meet national objectives and was not an eligible activity. As a result, HUD ordered the State to repay \$8.6 million in non-federal dollars and take a one-time grant reduction in 2015 of \$7,602,456.

The Department of Administration – Division of Housing's commitment of CDBG funds for projects during 2013 met national objectives & complied with overall benefit certification.

29) Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property

- a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.

The State requires each community to develop and adopt anti-displacement and relocation policies for their community. We require as part of a CDBG-EAP application for assistance a statement of assurances from the community that includes the following assurance "Will minimize displacement as a result of activities associated with CDBG fund, and will follow an adopted residential anti-displacement and relocations assistance plan."

- b. Describe steps taken to identify households, businesses, farms or nonprofit organizations that occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.

N/A

- c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.

N/A

30) Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons

- a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.

Self-certification forms and reporting by businesses using CDBG funding has been updated to ensure jobs are being made available to low- and moderate-income persons. A business is required to post all open vacancies with its local job center and advertise it in publications most likely to be read by low- and moderate-income persons. Public hearings on job creation projects are to describe that an objective of the projects is to make employment opportunities available to low- and moderate-income persons. A business is also required to work with agencies who work with the low to moderate income population.

- b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.

N/A

- c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.

N/A

31) Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit

- a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of who are low- and moderate-income.

N/A

32) Program income received

- a. Detail the amount repaid on each float-funded activity.

N/A

- b. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.

The Department of Administration received CDBG-ED loan funds in the amount of \$1,572,664.34 for the 2013-2014 program year.

- c. Detail the amount of income received from the sale of property by parcel.

N/A

33) Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:

- a. The activity name and number as shown in IDIS;

N/A

- b. The program year(s) in which the expenditure(s) for the disallowed activity (ies) was reported;

N/A

- c. The amount returned to line-of-credit or program account; and,

N/A

- d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.

N/A

34) Loans and other receivables

- a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.

N/A

- b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.

N/A

- c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.

N/A

- d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.

N/A

- e. Provide a List of the parcels of property owned by the grantee or its sub recipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.

N/A

35) Lump sum agreements

- a. Provide the name of the financial institution.

N/A

- b. Provide the date the funds were deposited.

N/A

- c. Provide the date the use of funds commenced.

N/A

- d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.

N/A

HOME/ADDI

HOME/ American Dream Down Payment Initiative (ADDI)

N/A

36) Assessment of Relationship of HOME Funds to Goals and Objectives

- a. Assess the use of HOME funds in relation to the priorities, needs, goals, and specific objectives in the strategic plan, particularly the highest priority activities.

See CPMP Tables and previous performance measure table. HOME funds were committed and disbursed consistent with our Annual Action Plan priorities.

- b. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.

See CPMP Tables and Summaries.

- c. Indicate the extent to which HOME funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.

100 % of HOME funds benefited extremely low-income, low-income, and moderate-income households.

37) HOME Match Report

- a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.

See attached.

38) HOME MBE and WBE Report

- a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).

See attached.

39) Assessments

- a. Detail results of on-site inspections of rental housing.

Division of Housing staff monitored 19 HOME Rental Housing Development-financed projects within Wisconsin during the 2014 financial year (April 1, 2014- March 31, 2015). Rental housing projects were

monitored for compliance with U.S. Housing and Urban Development (HUD) HOME regulations and to ensure the projects provide decent, safe and sanitary living conditions. In addition to physical building inspections, project management and tenant files were reviewed for HOME-financed buildings and rental units to ensure program compliance. All projects monitored in 2014 were found to be in compliance by the completion of the HOME RHD monitoring.

b. Describe the HOME jurisdiction's affirmative marketing actions.

HOME recipients used the established affirmative marketing policies and procedures that HOME recipients must adopt. These policies and procedures are based upon the Code of Federal Regulations (CFR), specifically 24 CFR 92.351. HOME recipients must make an effort to inform potential applicants from all racial, ethnic and gender groups in the housing market about available vacant units and, in particular, persons in the housing market area that are not likely to apply for HOME-assisted housing.

During the program year, the Division of Housing did not receive any complaints concerning its recipients' affirmative marketing practices.

c. Describe outreach to minority and women owned businesses.

All DOH application materials and trainings, implementation materials and training, and grant recipient contracts and reporting forms include Minority Business Enterprises and Women Business Enterprises requirements.

HOPWA

Specific HOPWA Objectives

40) Assessment of Relationship of HOPWA Funds to Goals and Objectives.

- a. Assess the use of HOPWA funds in relation to the priorities, needs, goals, and specific objectives in the strategic plan, particularly the highest priority activities.

See Attached HOPWA Report

- b. Evaluate progress made towards meeting the goals of providing affordable housing using HOPWA funds, including the number and types of households served.

***If not using the CPMP Tool:** Use Table 2A, 1C, 2C, 3A)

***If using the CPMP Tool:** Use Need/Housings, Summary of Specific Annual Objectives.

See Attached HOPWA Report

To report progress under the general and HOPWA specific requirements, the grantee may integrate the HOPWA elements in their standard CAPER report or establish a HOPWA-specific narrative by completing the following information. IDIS Report PR80 has useful financial and accomplishments information for end of year reporting.

HOPWA EXECUTIVE SUMMARY

41) Provide an executive summary (1-3 pages) and a specific objectives narrative which address the following:

- a. Grantee and Community Overview.

- i. A brief description of the grant organization, the area of service, the name of the program contact(s), and a broad overview of the range/type of housing activities, along with information on each sponsor by name, main project site by zip code and related organization information.
- b. Annual Performance under the Action Plan
- i. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.
 - ii. Evaluate the progress in meeting the project's objectives for providing affordable housing, including a comparison of actual outputs and outcomes to proposed goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.
 - iii. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.
 - iv. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan. Report the number of stewardship units of housing which have been created through acquisition, rehabilitation or new construction with any HOPWA funds.
 - v. Describe any other accomplishments recognized in the community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
 - vi. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Strategic Plan.
- c. Barriers or Trends Overview
- i. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement;
 - ii. Describe any expected trends facing the community in meeting the needs of persons with HIV/AIDS, and provide any other information important in providing services to persons with HIV/AIDS.
 - iii. Note any evaluations, studies, or other assessments of the HOPWA program available to the public.
- d. Project Accomplishment Data:
- i. Complete and submit CAPER Performance Chart 1 Planned Goals and Chart 2 Actual Performance;
 - ii. Complete and submit CAPER Performance Chart 3 for Housing Stability Outcomes, HOPWA Outcomes on Access to Care and Support in conjunction with HOPWA-funded Housing assistance, Monthly Household

Income in conjunction with HOPWA-funded Housing Assistance, and HOPWA Outcomes on Access to Care and Support not in conjunction with HOPWA-funded Housing Assistance.

See Attached HOPWA Report

OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

HUD TA Initiative

As a result of the 2012 HUD findings related to economic development activities funded by the former Department of Commerce, the Department of Administration – Division of Housing (DOH) requested HUD Technical Assistance (TA) in March 2013.

This request related to various aspects of Economic Development and Public Facility program administration, including: application documents, review process, project underwriting, implementation guides, training materials, and sub recipient reporting and allowable cost documentation; sub recipient risk matrix and project monitoring; program income, the defederalization process under 105 (a) (15), and revolving loan funds; IDIS reports and Section 3 electronic filing; and, marketing program benefits to units of general local government.

DOH received HUD's approval of the TA request in December 2013. HUD assigned the Minnesota Housing Partnership (MHP) as the HUD TA provider that would complete a needs assessment and projected work plan.

The MHP conducted on-site visits with DOH and two program sub recipients in January 2014, to gather information related to the request and draft a work plan for HUD Washington's review. The DOH received notice that HUD had approved the work plan on May 7, 2014.

In a conference call in May 2014, the MHP informed DOH that the Wisconsin Partnership for Housing Development (WPHD) and the WSOS (CAP agency located in Ohio) had been contracted to provide the TA that DOH requested. The HUD TA contract initially ran through December 2014. HUD has extended the contract for the TA provider, but the State has not been informed of the contract period.

An initial conference call between the MHP, WSOS, and the DOH was held at the end of May to establish/set parameters and to gather data and questions. The WPHD and DOH have had a meeting during June 2014 to agree on priorities. MHP and WSOS held onsite visits on July 9-10, 2014.